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October 23, 2024

VIA ECF

The Honorable Arun Subramanian, U.S.D.J.
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

GRANTED with strings attached. With the copious time that the parties are asking for, they will have time for a face-to-face discussion between lead counsel and the principal client decisionmaker on each side, to last no less than 2 hours, where the parties can see if they can resolve this case short of 15 depositions. That meeting should happen in the next two weeks, and the parties should provide the Court with a status update no later than **November 8, 2024**. And no further discovery extensions.

The Clerk of Court is directed to terminate the motion at Dkt. 47.

Re: Van Duser et al. v. Tozzer LTD., et al., 1:23-cv-09329 (AS)

SO ORDERED.

Arun Subramanian, U.S.D.J.
Dated: October 24, 2024

Dear Judge Subramanian:

This firm represents the Plaintiffs. With Defendants' consent, we respectfully request the following extensions of the Court's April 25, 2024 (Doc. No. 33) Scheduling Order:

- Deposition deadline be extended from October 26, 2024 to December 20, 2024;
- Deadline to complete all discovery is extended from November 1, 2024 to December 26, 2024; and
- Deadline to serve post-discovery summary judgment motions shall be extended from November 22, 2024 to January 16, 2025, with the deadline for answering papers extended to February 13, 2025, and deadline for reply papers extended to ~~March 6, 2025~~
February 20, 2025

The parties request this extension to allow for additional time to coordinate the approximately 15 depositions. This request will not affect any other dates or deadlines. We appreciate the Court's consideration of this request.

Respectfully submitted,
LIPSKY LOWE LLP

s/ Douglas B. Lipsky
Douglas B. Lipsky

CC: Counsel of Record (Via ECF)